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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

LOUJAIN HATHLOUL ALHATHLOUL,

Civil No. 3:21-cv-01787-IM

Plaintiff,

v.

DARKMATTER GROUP,
MARC BAIER,
RYAN ADAMS, and
DANIEL GERICKE

**PLAINTIFF’S UNOPPOSED MOTION
FOR EXTENSION OF TIME TO
RESPOND TO DEFENDANTS’ JOINT
MOTION TO DISMISS FIRST
AMENDED COMPLAINT**

Defendants.

LOCAL RULE 7-1 CERTIFICATION

The undersigned counsel certify that counsel for Plaintiff have conferred with counsel for Defendants and Defendants assented to this motion.

**MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANTS’ JOINT
MOTION TO DISMISS FIRST AMENDED COMPLAINT**

Plaintiff Loujain Alhathloul, by and through her undersigned counsel, hereby submits this Unopposed Motion for Extension of Time to Respond to Defendants’ Joint Motion to Dismiss First Amended Complaint. Plaintiff seeks to extend the deadline for filing her response up to and until September 12, 2023.

Defendants served their Joint Motion to Dismiss electronically through CM/ECF on July 10, 2023. (*See* Joint Motion to Dismiss First Amended Complaint (ECF 63)). According to Local Rule 7-1(e), Plaintiff must file and serve any response within 14 days after service of the motion, which would make Plaintiff’s response due on July 24, 2023.

Plaintiff requests an extension up to and until September 12, 2023, to file her response. Defendants assented to this request.

The request comes due to Plaintiff's location overseas, and precautions that must be taken to communicate with her securely, which meaningfully delay counsel's ability to discuss the case with her. In addition, this request comes due to pre-existing commitments of Plaintiff's counsel, including briefing due in other cases and travel scheduled over this response period. These reasons provide good cause for an extension. This request is made in good faith and not for purposes of delay.

WHEREFORE Plaintiff hereby respectfully requests that the Court grant this unopposed motion for an extension of time until September 12, 2023, for Plaintiff to file her response to Defendants' Joint Motion to Dismiss.

Dated: July 18, 2023.

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